

Pioneer North America, Inc.
8000 Towers Crescent Dr., 13th Floor
Vienna, VA 22182

March 12, 2008

VIA ECFS AND E-MAIL

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte notice, DTV Consumer Education Initiative, MB Docket No. 07-148

Dear Ms. Dortch:

On March 11, 2008, the undersigned spoke by telephone to Eloise Gore of the Media Bureau regarding the Order adopted in the above docket on February 19, 2008. During the call, the undersigned requested certain changes be made to the order, consistent with the March 6 ex parte submission of the Consumer Electronics Association.

We requested that the Commission alter the effective date of the regulations discussed in Paragraph 46 and the new rule, §15.124 to 30 days after the date upon which the Report and Order is published in the Federal Register, rather than immediately upon publication as specified in Paragraph 72. If extended, this extension of time would allow Pioneer and other manufacturers sufficient lead time to comply with the consumer information requirements. We noted that such an effective date would comport with similar requirements upon other parties (e.g., multichannel video programming distributors), that are not required to modify production of devices manufactured (in many cases) overseas.

We also requested clarification of the text in Paragraph 47, and in particular, the text in the new rule §15.124(b), "... and related devices ...". There are no "related devices" which may be sold as new after March 1, 2007 which "... will not serve its function, in regard to full-power OTA signals, unless connected to a device with a digital tuner" (Para. 47, last sentence). Such devices (that would be unable to serve their function) would not comply with 47 CFR 15.117(i) (the "Tuner Mandate"), as they would necessarily have an analog television tuner but lack a digital television tuner.

I explained that Pioneer supports the positions advocated by the Consumer Electronics Association in its March 6 letter.

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In accordance with §1.1206 of the Commission's Rules, one copy of this letter is being filed electronically via ECFS, and delivered via email to Ms. Gore.

Regards,

A handwritten signature in blue ink, appearing to read "Adam Goldberg", is positioned above the printed name.

Adam Goldberg
Vice President
Government and Industry Affairs
Pioneer North America, Inc.
(703) 846-3650

cc: Eloise Gore (via email)